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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

10 NIA MUJADADI-TURAN,

CASE NO. 5:15-CV-2752 (EJD)

11 Plaintiff,

**FURTHER JOINT STIPULATION TO  
CONTINUE DEADLINE FOR  
DEFENDANTS MOTOROLA MOBILITY,  
LLC AND METROPOLITAN LIFE  
INSURANCE COMPANY TO RESPOND  
TO PLAINTIFF'S COMPLAINT**

12 v.

13 MOTOROLA MOBILITY, LLC;  
METROPOLITAN LIFE INSURANCE  
COMPANY,

15 Defendants.

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CASE NO. 5:15-CV-2572(EJD)

Joint Stipulation To Continue Deadline For Defendants Motorola Mobility, LLC And Metropolitan Life Insurance Company To Respond To Plaintiff's Complaint

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## **JOINT STIPULATION**

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and Defendants Motorola Mobility, LLC (“Motorola”) and Metropolitan Life Insurance Company (“MetLife”) (Plaintiff, Motorola, and MetLife are referred to as the “Parties”), hereby jointly stipulate to a seventh extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective responses to Plaintiff’s Complaint will be continued from February 8, 2016 to March 7, 2016. To support this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action and MetLife in the United States District Court for the Northern District of California. (See ECF, Doc. No. 1.)

2. MetLife was served with the Summons and Complaint on June 26, 2015.

3. Motorola was served with the Summons and Complaint on July 21, 2015.

4. The Parties submitted stipulations extending the deadline for MetLife

4. The Parties submitted stipulations extending the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22, 28, 31, 38, 40.)

5. The Parties submitted stipulations extending the deadline for Motorola to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27, 32, 38, 40.)

6. Since the last request, the Parties have been engaged in conversations regarding either scheduling a settlement conference with a Magistrate Judge or retaining a private mediator. While no firm date for a settlement conference or mediation has been set at this time, the Parties are continuing to talk and are optimistic an agreement as to the form and the neutral will be reached soon.

7. On February 5, 2016, the Parties agreed to a further thirty (30) day extension of time for Motorola and MetLife to respond to Plaintiff's Complaint. Motorola and MetLife's respective responses to the Complaint are now due on or before March 7, 2016.

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2       8.     The Parties are optimistic that a resolution can be reached in this matter and  
3 the additional time will afford the Parties the opportunity to continue their settlement opportunities  
4 without incurring additional costs of litigation.

5       9.     This Stipulation will not alter the date of any event or any deadline already  
6 fixed by Court order.

7       10.    This is the eighth extension of time sought on behalf of MetLife and the  
8 seventh extension of time sought on behalf of Motorola.

9           We hereby attest that we have on file all holographic signatures corresponding to any  
10 signatures indicated by a conformed signature (/s/) within this e-filed document.

11          Dated: February 8, 2016

12                    */s/ Beth A. Davis*  
13                    BETH A. DAVIS  
14                    Attorneys for Plaintiff  
15                    NIA MUJADADI-TURAN

16          Dated: February 8, 2016

17                    */s/ Benjamin A. Emmert*  
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19                    LITTLER MENDELSON, P.C.  
20                    Attorneys for Defendant  
21                    MOTOROLA MOBILITY, LLC

22          Dated: February 8, 2016

23                    */s/ Linda B. Oliver*  
24                    LINDA B. OLIVER  
25                    MAYNARD, COOPER, & GALE, LLP  
26                    Attorneys for Defendant  
27                    METROPOLITAN LIFE INSURANCE  
28                    COMPANY